

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PHARO GAIA FUND, LTD., PHARO  
MACRO FUND, LTD. and PHARO  
TRADING FUND, LTD.

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF  
VENEZUELA, S.A.,

Defendant.

Case No. 20-cv-8497-AT

**NOTICE OF PLAINTIFFS' MOTION TO VACATE DEFAULT JUDGMENT AND  
VOLUNTARILY DISMISS CLAIMS WITHOUT PREJUDICE**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 60(b)(6) and 41(a)(2), and upon the accompanying Memorandum of Law, dated April 15, 2025, Plaintiffs Pharo Gaia Fund, Ltd., Pharo Macro Fund, Ltd., and Pharo Trading Fund, Ltd. move this Court for an order vacating Plaintiffs' default judgment against Defendant the Bolivarian Republic of Venezuela and thereafter dismissing the underlying claims without prejudice.

Dated: April 16, 2025

Washington, DC

Respectfully submitted,

/s/ Matthew D. McGill

Matthew D. McGill

MMcGill@gibsondunn.com

Nick Harper (*pro hac vice pending*)

NHarper@gibsondunn.com

1700 M St., N.W.

Washington, DC 20036

(202) 887-3680

*Counsel for Plaintiffs Pharo Gaia  
Fund, Ltd., Pharo Macro Fund, Ltd.,  
and Pharo Trading Fund, Ltd.*